

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:20-MJ-138
)	
STEPHANIE NICOLE WALLACE,)	
)	
Defendant.)	
)	

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL INFORMATION AND SUMMONS**

I, Nefertiti Berhane, being duly sworn, state the following:

1. I am a Special Agent with the U.S. Department of Interior's Office (DOI) of the Inspector General (OIG), in Herndon, Virginia. I have been employed with the OIG as a special agent for over three years. I completed my basic training at the Federal Law Enforcement Training Center in August 2016, and I have continued to receive specialized training since that time. In this role, I have conducted numerous criminal and administrative investigations.

2. This affidavit is submitted in support of a criminal complaint and summons for STEPHANIE NICOLE WALLACE, who embezzled, stole, purloined, or converted to her use money of the United States, or a department or agency thereof, in violation of Title 18, United States Code, Section 641, by using a government charge card issued by the National Park Service (NPS) to pay her children's private school tuition.

3. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during the course of this investigation, as well as the observations of other agents involved in this investigation. This affidavit contains

information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

PROBABLE CAUSE

4. At all times relevant herein, WALLACE was a budget analyst for the National Mall and Memorial Parks division of the NPS, a subdivision of the DOI. WALLACE's duties as a budget analyst included working with the permit office at the National Mall, tracking the status of their budget, assisting employees with budgeting their travel, and managing the utility bills for the National Mall and Memorial Parks.

5. In particular, WALLACE was in charge of submitting the National Mall and Memorial Park's electricity bill for payment each month by submitting invoices from the Potomac Electric Power Company (PEPCO) through DOI's Financial and Business Management System (FBMS). FBMS is an enterprise business management program used by the DOI to, among other things, track and pay invoices.

6. While WALLACE was responsible for submitting invoices for payment, she was not authorized to pay PEPCO invoices directly. She did not have a government credit card to pay utility bills and she was not authorized to use any government card to pay invoices. She was required to process all invoices through FBMS.

7. In spite of this, on or about December 10, 2018, WALLACE claimed that she was authorized to pay the December PEPCO bill with another employee's government credit card. That other employee, Employee-1, held a government purchase card to make purchases for Employee-1's office. WALLACE told Employee-1 that her supervisor had authorized her to use the purchase card to pay the PEPCO bill. Employee-1, believing WALLACE, gave WALLACE the purchase card number. In fact, WALLACE's supervisor had not authorized WALLACE to pay the PEPCO

bill with a credit card, and the PEPCO invoice at issue was processed through the FBMS system and paid in February of 2019.

8. On or about December 10, 2018, WALLACE logged into an online system to pay her children's school tuition from her home in Woodbridge, Virginia, within the Eastern District of Virginia. WALLACE manually entered Employee-1's name and government credit card information and made an \$8,328.24 tuition payment.¹

9. WALLACE received a confirmation email from the online processing company on or about December 11, 2018, confirming that she had made an \$8,328.24 tuition payment made on December 10, 2018. The confirmation email explicitly stated that Employee-1 was the accountholder for the credit card payment.

10. Employee-1 did not notice that WALLACE had misused her card until on or about June 20, 2018, when she was reconciling her government purchase card statements and discovered three charges from the online processing company on her December 2018 statement. Employee-1 called the number associated with the charge on her statement and discovered that the payment was made to a vendor used to process tuition payments and that the payment submitted had been used to pay the tuition for WALLACE's children.

11. On the same day, Employee-1 received an email from the processing company that included an attachment showing that \$8,328.24 in payments had been made using her government purchase card to a school in Woodbridge and that the payments were associated with WALLACE's payment plan for her children.

¹ During the fall of 2018, WALLACE had fallen behind in her monthly payments for her children's private school. WALLACE's payment history revealed that tuition payments were withdrawn automatically from her bank account each month. However, in October, November, and December of 2018, WALLACE's automatic withdrawals were rejected due to insufficient funds.

12. Employee-1 confronted WALLACE about the charge. WALLACE denied that she had paid her children's tuition with Employee-1's card and promised to provide Employee-1 documentation evidencing that the payments were made to PEPCO.

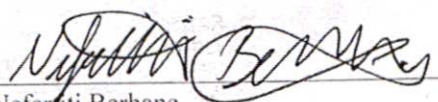
13. WALLACE later provided Employee-1 with a fabricated NPS invoice coversheet evidencing that she had paid \$8,328.24 to PEPCO on December 10, 2018. However, this coversheet did not match the actual PEPCO invoice for December of 2018, and WALLACE later admitted that she had fabricated the coversheet. WALLACE's supervisor also confirmed that WALLACE did not submit this coversheet for payment. WALLACE's supervisor also confirmed that the PEPCO bill WALLACE had provided was paid in full on February 1, 2019, and provided the true corresponding invoice coversheet.

14. On July 2, 2019, I interviewed WALLACE along with Special Agent Rene Olivas. During this interview, WALLACE admitted to using Employee-1's government charge card for the tuition payment. WALLACE initially claimed that she had made a mistake, but after she was encouraged to be truthful with law enforcement, WALLACE stated that she had paid her children's tuition using Employee-1's government purchase card from her home in Woodbridge, Virginia. WALLACE confirmed that the payment plan number associated with these charges was her account number with the private school her children attended.

CONCLUSION

15. Based on the foregoing, I submit that there is probable cause to believe that on or about December 10, 2018, in Woodbridge, Virginia, within the Eastern District of Virginia, WALLACE knowingly and willingly embezzled, stole, purloined, or converted to her use money of the United States, or a department or agency thereof by using Employee-1's government purchase card to make a payment toward her children's private school tuition, in violation of Title 18, United States Code, Section 641.

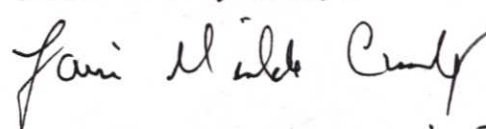
Respectfully submitted


Neferiti Berhane
Special Agent
United States Department of Interior



City of Alexandria, VA

The foregoing instrument
was acknowledged before me
on this 14th day of April, 2020.

By: Jamie Michele Curley


My Commission expires: July 31, 2023

Reg number: 7818497